



November 2, 2021

Mike Wieser – Director of Engineering and Public Works
City of Cedarburg
W63 N645 Washington Ave PO Box 49
Cedarburg, WI 53012-0049

Subject: City of Cedarburg (WPDES Permit No. WI-0020222)
Adaptive Management Plan – Conditional Approval

Dear Mr. Wieser:

The Wisconsin Department of Natural Resources (WDNR) has received the final draft of the Adaptive Management (AM) Plan prepared by Symbiont Science, Engineering and Construction, Inc. on behalf of the City of Cedarburg. The most recent plan was submitted on September 29, 2021 and considered comments provided on the initial draft from July 2021. The Department has reviewed the AM plan and has no additional comments at this time.

Based on the WDNR's review, the AM Plan is in general conformance with the WDNR Adaptive Management Guidance and requirements contained in s. NR 217.18, Wis. Adm. Code. The plan indicates that the City will utilize AM to comply with the effluent limitations for total phosphorus for their discharge from the City of Cedarburg Wastewater Treatment Facility, Outfall 001, to Cedar Creek. Actions outlined in the AM plan mostly involve nonpoint phosphorus reductions within the greater Milwaukee River Basin TMDL River Reach MI-22 and MI-24. For continued AM eligibility, phosphorus reductions undertaken by the City and its partners are expected to offset the WWTP's proportional phosphorus loading to Cedar Creek, 514 lbs/yr, within the first permit term.

The WDNR conditionally approves the AM Plan as a basis for phosphorus compliance during the next WPDES permit term. The WDNR has assigned the AM plan a tracking number of WQT-2021-0011 and will be referenced as such in the draft WPDES permit. The draft permit will contain an interim limit for phosphorus and reporting requirements consistent with s. NR 217.18, Wis. Adm. Code. The final AM plan will be included as part of the public notice package for permit reissuance, and final approval is subject to public comment and EPA review.

The WDNR appreciates your interest in watershed-based phosphorus compliance. If you have any questions or comments, please contact me at (414) 897-5723 or nicholas.lent@wisconsin.gov.

Thank you,

Nick Lent

Wastewater Engineer
Wisconsin Department of Natural Resources

e-CC: Curt Nickels, WDNR
Bryan Hartsook, WDNR
Laura Dietrich, WDNR
Lisa Creegan, WDNR
Matt Claucherty, WDNR
Eric Hackert, City of Cedarburg
Jon Butt, Symbiont